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January 9, 2025

VIA ECF

Hon. Frederic Block
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Teamsters Local Union No. 804 v. City of New York, et al.,
24-CV-8683 (FB)(TAM)


Your Honor:

I am the attorney assigned to represent the defendants in this matter. Defendants write to respectfully request the Court enlarge the time for the defendants to respond to the complaint to March 10, 2025. Plaintiff's counsel consents to this request.

The City was served on December 20, 2024. This enlargement is requested in order to facilitate the defendants' investigation into the facts of this case. Before this Office can adequately respond to the complaint, we must conduct an investigation, which includes, at a minimum, obtaining any records relating to the plaintiff's claims. The defendants therefore request an enlargement of time to respond so that we may properly investigate the allegations of the complaint and fulfill our obligations under Rule 11 of the Federal Rules of Civil Procedure. Accordingly, the City respectfully requests that the Court enlarge its time to respond to the Complaint up to and including March 10, 2025.

Defendants thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ 

Hannah V. Faddis
Special Federal Litigation Division

cc: **VIA ECF**
All counsel of record